ADM – FY 2025 AU Modern Slavery Disclosure

1. Introduction

This statement ("Statement") is a joint modern slavery statement made under the Australian Modern Slavery Act 2018 (Cth) for the reporting period 1 January 2024 to 31 December 2024. It covers two reporting entities: ADM Australia Holdings I Pty Ltd ("ADM Holdings") (ACN 158 548 675) and its wholly owned subsidiary ADM Trading Australia Pty Ltd ("ADM Trading") (ACN 126 806 979), whose registered office is Naylor House, Level 4 North, 191 Pulteney Street Adelaide SA 5000 Australia. ADM Holdings is the parent company of two wholly owned Australian subsidiaries, ADM Trading and ADM Australia Pty Ltd ("ADM Australia") (ACN 057 641 308). The immediate parent of ADM Holdings is Archer Daniels Midland Singapore, Pte. Ltd. The ultimate parent undertaking and controlling party is Archer Daniels Midland Company, which is incorporated in Illinois, Unites States of America. ADM Trading and ADM Australia do not themselves own or control any other entities

2. ADM Structure and Operations

Archer-Daniels-Midland Company and its subsidiaries (the "Company" or "ADM") unlocks the power of nature to enrich the quality of life. The Company is an essential global agricultural supply chain manager and processor, providing food security by connecting local needs with global capabilities. ADM is also a premier human and animal nutrition provider, as well as a leader in health and well-being products. Around the globe, ADM's expertise and innovation are meeting critical needs from harvest to home. Learn more at www.adm.com

ADM is a truly global company of approximately 41,496 employees working together to achieve extraordinary results. The Company's operations are organized, managed, and classified into three reportable segments: Ag Services and Oilseeds, Carbohydrate Solutions, and Nutrition. Each of these segments is organized based upon the nature of products and services offered:

- The Ag Services and Oilseeds segment includes global activities related to the origination, merchandising, transportation, and storage of agricultural raw materials, as well as the crushing and processing of oilseeds, including soybeans and soft seeds such as cottonseed, sunflower seed, canola, rapeseed, and flaxseed. The segment produces and markets vegetable oils and oilseed protein meals used by food, feed, energy, and industrial customers. Crude and partially refined vegetable oils are sold to third parties, including renewable diesel manufacturers, or further processed into salad oils, margarine, shortening, biodiesel, glycols, and other food and industrial products. Oilseed protein meals are primarily sold as ingredients for commercial livestock and poultry feeds. The segment is also a major supplier of peanuts and peanut-derived ingredients and manufactures cotton cellulose pulp in North America for chemical, paper, and other industrial markets. In addition, its integrated grain sourcing, handling, and multimodal transportation network supports global import, export, and distribution activities and provides essential services to customers and the Company's processing operations. The Company also engages in various structured trade finance activities through this segment to leverage its global trade flows.

- The Carbohydrate Solutions segment engages in corn and wheat wet and dry milling and related processing activities. The segment converts corn and wheat into products and ingredients used in food and beverage applications, including sweeteners, starches, syrups, glucose, wheat flour, and dextrose. Dextrose and starches are also utilized as feedstocks in

downstream processes, including fermentation to produce alcohol and other food and animal feed ingredients. Ethanol is produced for use as an octane enhancer and oxygenate in gasoline. In addition, the segment produces distillers' grains, corn gluten feed, and corn gluten meal for use as animal feed ingredients. Corn germ, a by-product of wet milling, is further processed into vegetable oil and protein meal, and citric acids are produced for food and industrial applications. The Carbohydrate Solutions segment also advances carbon capture and sequestration and other emissions-reduction initiatives, positioning the business to support lower-carbon operations and the growing use of plant-based alternatives to fossil-derived materials.

- The Nutrition segment serves various end markets including food, beverages, and nutritional supplements for humans, and complete feed, feed premix and additives, pet food and pet treats for livestock, aquaculture, and pets. The segment engages in the creation, manufacturing, sale, and distribution of a wide array of ingredients and solutions including plant-based proteins, flavors and colors derived from nature, flavor systems, emulsifiers, soluble fiber, polyols, hydrocolloids, probiotics, prebiotics, postbiotics, enzymes, botanical extracts, and other specialty food and feed ingredients and systems. The Nutrition segment also includes activities related to the procurement, processing, and distribution of edible beans, the processing and distribution of formula feeds and animal health and nutrition products and the manufacture of contract and private label pet treats and foods.

The activities of the Australian reporting entities described fall principally within the Ag Services and Oilseeds segment (in the case of ADM Trading's commodity trading) and, in the case of ADM Australia Pty Ltd, within the group's Nutrition segment. The principal activities of the reporting entities are:

- ADM Trading Australia Pty Ltd: the trading of grains, cotton, oilseeds and legumes. ADM Trading connects Australian growers with domestic and international markets, providing risk management, logistics, and supply chain solutions and having country aggregator facilities in Western Australia, Victoria and Queensland and two grain receival sites in South Australia and Victoria. ADM Trading's supply chain consists of the origination and acquisition of grain, cotton, oilseed and legume commodities and the subsequent trading, merchandising and sale of those commodities, including substantial related-party sales.

- ADM Holdings: a non-operating holding company and does not have its own operations or supply chain. It does not generate revenue or employ any employees. ADM Holdings is the immediate parent company of ADM Australia and ADM Trading; as such, the principal activities within the consolidated group also include the importation and distribution of food oddities, bioproducts and protein specialties in Australia with a central office and laboratory in Sydney, New South Wales and an office in Melbourne, Victoria.

3. ADM's Policies Related to Human Rights in our Supply Chain and Operations

A. Governance

The Sustainability and Technology Committee of the Board actively oversees the Company's objectives, goals, strategies, and activities relating to sustainability. The Committee also oversees the Company's compliance with sustainability laws and regulations, assesses performance relating to industry benchmarks, and assists the Board of Directors in overseeing the Company's operations as a sustainable organization and responsible corporate citizen in order to enhance shareholder value and protect ADM's reputation. The Company's Chief

Sustainability Officer, Senior Vice President of Global Operations, and Chief Technology Officer regularly attend committee meetings as management representatives. The Executive Council of ADM, the Company's highest strategic and operational body, provides close supervision of the Company's Environmental, Social and Governance (ESG) efforts and in-depth review of sustainability issues.

Furthermore, regional sustainability teams, along with the corporate sustainability team, support the Chief Sustainability Officer to drive sustainability efforts in the Company's facilities and supply chains around the world. ADM's sustainability efforts are also supported by functional expertise throughout the Company such as in Operations and Utilities, Supply Chain and Procurement, Agricultural Services and Oilseeds, and Environmental Health and Safety. Further details on ADM's governance are available at Governance at ADM.

B. ADM's Policies

Our Code of Conduct is fundamental to everything we do at ADM. We take seriously our At ADM, the Code of Conduct is fundamental to everything we do. We believe in making a positive impact and leading by example, setting a global standard for good business that other companies in our industry will follow. Building on this principle, the Code of Conduct illustrates what doing business with integrity means to us, no matter where we are in the world.

Respect for human rights is an integral part of our ambition to make a positive impact in the global community. The Human Rights Policy outlines how we uphold and promote the rights of our employees, those within our value chain, and in the communities in which we operate. We strive to promote human rights in accordance the United Nations Declaration of Human Rights and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO). The Human Rights Policy addresses, though is not limited to, the following key areas:

- Forced, Bonded, or Compulsory Labor - ADM prohibits the use of all forms of forced labor, including bonded labor, indentured labor, and child labor in our operations and our supply chains. Employees should not be charged fees in exchange for employment or have collateral in the form of money, identification or other personal belongings held – without workers' consent – as a condition of employment. The use of physical punishment, violence or other forms of abuse will not be tolerated.

- Child Labor - ADM prohibits child labor, defined as work that is hazardous to children's health, safety or morals, work that interferes with compulsory education or for which they are simply too young. All workers in our operations and our supply chain must meet the minimum age to work as defined by ILO Convention 138 as well as applicable local laws and regulations.

In addition, ADM has established Supplier Expectations that set clear standards expected for suppliers to follow in areas such as business integrity, labor conditions and human rights, and environment and land rights. We expect all our suppliers to do business fairly, ethically and in compliance with all applicable local laws and regulations.

All ADM colleagues are expected to adhere to the commitments set out in our Human Rights Policy. Allegations of violations will be investigated, and confirmed violations may result in disciplinary action, up to and including termination of employment.

Furthermore, if any supplier, contractor, or business partner fails to adhere to the Supplier Expectations' commitments, or misrepresents the conditions under which crops, goods, or services have been produced, ADM will take appropriate action. We expect cooperation with investigations of alleged violations and disclosure of remediation measures. If the party does not demonstrate a good-faith effort to address issues in a timely manner, actions may include exclusion from new direct contracts and/or termination of the relationship.

C. Embedding ADM's Policies Across the Organization

ADM makes its corporate policies accessible to all colleagues and stakeholders. Employees can access global and regional corporate policies through our internal central resource, while the public can view them at www.adm.com by searching for 'policies'. ADM's policies are typically translated into key languages to ensure broad understanding across our global supply chains. Additionally, our Supplier Expectations may be communicated at the regional and business unit levels through procurement contracts, purchase orders, quality manuals, or public reports.

ADM integrates training on its corporate policies into every stage of employment. New colleagues complete Code of Conduct training during the onboarding to understand ADM's shared values and expected behaviors. To reinforce these principles, ADM provides regular refresher trainings on the Code of Conduct, reflecting the Company's ongoing commitment to responsible business practices.

In 2025, 91 ADM colleagues from the Australian business completed the sustainability training. The training was designed to deepen understanding of why sustainability, one of the key pillars of ADM's growth strategy, is essential to our business. The training highlights how ADM integrates its sustainability goals and commitments into all aspects of its operations. It also addresses ADM's human rights programs, including our commitment to human rights protection and sustainability due diligence.

4. Identifying and Assessing Risks

A. ADM Sustainability Salient Risk

In 2023, ADM partnered with a United States–based non profit organization recognized as a leading center of expertise on the UN Guiding Principles on Business and Human Rights to conduct a comprehensive assessment of its sustainability salient risks. The assessment reviewed the severity of potential risks, considering their scale, scope, and irremediability, as well as the likelihood of their occurrence. Through this process, ADM gained a deeper understanding of how its activities and business relations may negatively affect communities, identifying the salient risks outlined below:

- Child Labor - Work performed by child that is hazardous to children's health, safety or morals, that interferes with compulsory education or for which they are simply too young.

- Forced Labor - Work performed involuntarily under the threat of a penalty, including practices such as debt bondage, withheld documents, recruitment fees, or abuse.

- Gender Discrimination - Unequal treatment or opportunities based on gender within the workplace or labor market.

- Health and Safety - Serious violations of occupational health and safety standards that endanger workers' well-being.

- Impacts on Communities - Adverse effects on the rights, livelihoods, or environments of local communities resulting from business activities.

- Just Transition in Agriculture - Shifts toward sustainable agricultural practices that may unfairly disadvantage workers or communities.

- Living Wages - Compensation that fails to meet basic needs.

ADM understands that sustainability risks evolve over time, and we continually review the risks outlined above through ongoing research and stakeholder feedback, including insights gathered from our public-facing grievance mechanisms.

B. Prioritizing Sustainability Risks

ADM conducts regular risk assessments across its ingredient and commodity supply chains. We integrate insights from our salient risk analysis into more detailed, quantitative assessments that measure supplier and supply chain risks, enabling prioritization and targeted action.

In 2025, as part of our ingredient risk assessment, we evaluated more than 6,000 ingredient supply flows, defined as suppliers by ingredient type. Furthermore, we refined the results of the commodity supply chain risk assessment previously conducted in 2024. The earlier assessment analyzed social risks associated with specific commodities, including barley, rapeseed, wheat and beans sourced in Australia.

Both the ingredient and commodity risk assessments were conducted through three distinct phases:

- Phase 1: Product Risk - This phase evaluates risks based on the social risk associated with the production, such as workforce profile and production characteristics.

- Phase 2: Geography Risk - Building on the findings from phase one, ADM uses over 20 indices, aligned with the identified salient risks, to evaluate country-level risk. Among these are the Children's Rights in the Workplace Index (UNICEF and Global Child Forum) and the Global Slavery Index (Walk Free Foundation).

- Phase 3: Leverage - Leveraging insights from phases one and two, this phase focuses on prioritizing higher-risk suppliers and supply chains based on ADM's level of leverage with each supplier or supply chain.

The following area has been identified as a priority for sustainability risk management, due to exposure to social risks, such as child and forced labor.

Commodities:

- Global Palm - Although ADM does not own or operate palm oil plantations or mills, we recognize our role in influencing sustainable practices throughout the palm value chain. ADM sources palm oil and palm kernel oil from Southeast Asia and Latin America. These products are further processed to create tailored solutions for a variety of applications, including baked goods, confectionery, and frying.

Ingredients:

- Global Ingredients - ADM sources a diverse range of ingredients, such as oils, fruits, vegetables, nutritional additives and supplements, to create and manufacture ingredient solutions for food and feed industries. About 25% of the over 6,000 ingredient supply flows assessed may carry higher sustainability risks

5. Implementing Effective Actions

A. Due Diligence Framework

ADM's sustainability due diligence process is an integrated, cross-functional framework aiming to avoid causing or contributing to adverse impacts on people, the environment and society by identifying, preventing, mitigating, and accounting for potential and actual sustainability issues across our supply chains. We aim to align our due diligence program with the United Nations Guiding Principles on Business and Human Rights and the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Business Conduct. ADM's sustainability due diligence framework operates through the following steps:

- Assessing Risk and Impact - Guided by policy commitments, ADM systematically identifies, evaluates, and prioritizes potential and actual sustainability risks across its operations and business relationships. The risk assessment is conducted internally, drawing on more than 20 indices from leading research institutions and risk management vendors.

- Implementing Effective Actions - Based on the findings of the risk and impact assessment, ADM proceeds to implement effective actions to prevent and mitigate adverse impacts, integrating these measures into relevant decision-making and operational processes.

- Tracking and Monitoring - ADM monitors and evaluates the progress of corrective actions, collaborative actions and the effectiveness of its sustainability programs.

- Communicating and Reporting - ADM commits to maintaining regular communication and reporting on its sustainability performance, promoting transparency and fostering sustainable practices across the industry.

ADM's due diligence program operates at a global level and continues to be strengthened across regions and product lines. As with any large-scale program, levels of maturity may naturally vary, and we are committed to ongoing enhancement. The program will continue to evolve as we refine our practices and incorporate insights from emerging supply chain due diligence legislation.

B. Global Palm

Traceability – ADM has achieved and maintained traceability for the majority of its sourced crude palm oil and palm kernel oil to mill level and plantation levels. The exact figures are reported annually in our sustainability reports, available at corporate reports.

Certification – ADM's palm product portfolio includes Roundtable on Sustainable Palm Oil (RSPO) certified crude palm oil and palm kernel oil. We offer both segregated volumes, sourced exclusively from certified farms and kept separate from non-certified palm products to ensure full traceability, and mass balance volumes, which combine certified and non-certified palm products but maintain tracking of certified content.

Management Systems – ADM continuously monitors the compliance of its direct palm suppliers with the Company's sustainability requirements. To strengthen oversight, ADM partners with a third-party verification body to assess potential deforestation linked to mills in its supply chains through satellite monitoring. The assessment also reviews suppliers' sustainability commitments and their implementation mechanisms, including supplier's human rights policy, sustainability due diligence programs and public grievance logs.

Collaborative Action – ADM participates of The Palm Oil Collaboration Group, contributing to the advancement of the No Deforestation, No Expansion on Peat and No Exploitation (NDPE) Implementation Reporting Framework (IRF) to drive progress on reporting against NDPE criteria. We also recognize the Indonesian Sustainable Palm Oil / Malaysian Sustainable Palm Oil as regulatory framework and an entry point to NDPE IRF framework.

Memberships – ADM is a member of the Roundtable on Sustainable Palm Oil (RSPO). RSPO is an international organization that develops global certification standards for sustainable palm oil based upon an exacting set of criteria, including the fair treatment of workers. As market demand drives the volume of certified products, we remain committed to continuously evaluating our product offerings to meet the demand for RSPO-certified products.

C. Ingredient Supply Chain

Traceability – ADM's internal tools enable effective tracking and management of ingredient sourcing, including visibility into country of origin and supplier detailed information.

Certification – ADM offers a range of certified ingredients, drawing on our expertise in sourcing certified tropical fruits, tea, sugar, and cocoa products through globally recognized sustainability standards, including Fair Trade and the Rainforest Alliance.

Management System - We onboard suppliers identified as medium or higher risk through our risk assessment process in platforms that enable ADM to continuously monitor the progress of our suppliers on responsible sourcing audits and self-assessment questionnaires (SAQ), providing visibility into our supply chain's compliance with labor standards, health and safety, environment and business ethics best practices. ADM is connected to four Australian supplier's processing sites and warehouses on the Supplier Ethical Data Exchange (Sedex). In addition, ADM recognizes other sustainability assessment schemes and certifications, including Ecovadis.

Collaborative Action - ADM works in partnership with civil society organizations and the private sector to promote initiatives around the world that advance food security, sustainability,

and health and well-being. For example, ADM colleagues dedicated 9 hours to volunteering in Australia, supporting initiatives that promote nutrition and food security..

We engage smallholder farmers across our value chain through capacity-building programs that support training, equitable business opportunities, and community livelihoods. To date, we have not identified any loss of income to vulnerable families resulting from these efforts. For more information on our sustainability efforts, please visit our sustainability website

6. ADM's Remediation of Human Rights Issues

A. ADM Way Helpline

We host a 24-hour phone line, an email address, and a mailing address through which violations of applicable laws, regulations, or our policies can be reported. ADM employees, on-site service providers, and workers in our supply chains may raise concerns anonymously, where permitted by applicable law. Reports are promptly and thoroughly investigated and addressed as appropriate. For more information, refer to ADM Way Helpline Frequently Asked Questions (FAQ) page.

B. Public-Facing Grievance Mechanism

We have a protocol that outlines our workflow and response mechanism for addressing concerns and inquiries pertaining to deforestation or human rights violations in our operations or supply chains. The grievance mechanism is available to any party, internal or external, who wants to voice a concern by emailing responsibility@adm.com or through our ADM Way Helpline.

Allegations of violations of our Policy to Protect Forests, Biodiversity and Communities or Human Rights Policy will be investigated according to the protocol, and results will be added to the Grievances and Resolutions Log.

C. Remediation

ADM engages with its stakeholders on an ongoing basis to monitor for forced or child labor risk factors and to appropriately remediate any issues or material risks that are identified. Remediation is undertaken in a manner that is sensitive to the risk of adverse income consequences to vulnerable families that can result from broader remediation measures.

In 2025, supplier audits indicated two instances where workers paid fees that could be interpreted as recruitment-related charges. The cases involved a service provider engaged by one of ADM's direct suppliers. After becoming aware of the issue, ADM contacted the supplier to clarify the circumstances and confirm the corrective actions taken. The supplier reported that affected workers were reimbursed through a one-time payment. This reimbursement was verified by an independent third-party auditing firm. The service provider was subsequently reminded of the supplier's zero-fee recruitment policy and informed of the supplier's right to conduct third-party assessments to monitor ongoing compliance.

7. Consultation

This Statement was prepared in consultation with each reporting entity it covers. Because ADM Holdings, ADM Trading and ADM Australia operate under the same group wide human rights

and modern slavery policies, systems and procedures, a single consolidated description of those policies and actions has been prepared and then reviewed on behalf of each reporting entity. ADM Holdings is a non-operating holding company with no employees and no operations of its own; its participation in this statement was therefore effected through its directors and officers and the group legal, compliance and sustainability functions, who confirmed the content of the statement insofar as it concerns ADM Holdings. In the case of ADM Trading and ADM Australia, relevant personnel with responsibility for operations, procurement and supply chain also reviewed and contributed to the Statement.

Compliance Annex

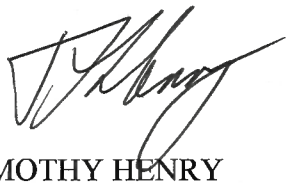
ADM is a highly integrated business. Accordingly, the same or similar human rights and modern slavery systems, practices, policies and procedures apply to all ADM entities in our group at a global and local level, including at the level of ADM Holdings, ADM Trading and ADM Australia. However, we have provided more specific information about how ADM Holdings and ADM Trading have satisfied each of the mandatory reporting criteria contained in the Modern Slavery Act 2018 (Cth) below.

Section 16(1) mandatory content criteria	**Cross-reference**
(a) The statement must clearly identify the reporting entity it covers (s 16(1)(a)). For a joint statement, every reporting entity covered by the statement must be identified	Section 1, Introduction, page 1
(b) The statement must describe the structure, operations and supply chains of the reporting entity	Section 2, ADM Structure and Operations, pages 1-2
(c) The statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	Section 4, Identifying and Assessing Risks, pages 4-6
(d) The statement must describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	Section 3, ADM's Policies Related to Human Rights in our Supply Chain and Operations, pages 2-4 Section 5, Implementing Effective Actions pages 6-8 Section 6, ADM's Remediation of Human Rights Issues, pages 8-9
(e) The statement must describe how the reporting entity assesses the effectiveness of such actions	Section 5, Implementing Effective Actions pages 6-8
(f) describe the process of consultation with: (i) any entities that the reporting entity owns or controls; and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement	Section 7, Consultation, page 9

This joint statement is made under the Australian Modern Slavery Act 2018 ("Act") on behalf of both reporting entities, ADM Australia Holdings I Pty Ltd and ADM Trading Australia Pty Ltd for the year ending December 31 2025.

This joint statement was approved by the board of ADM Australia Holdings I Pty Ltd, as a reporting entity and as the parent entity of ADM Trading Australia Pty Ltd, on 22 July 2026.

This joint statement is signed by Timothy Henry in his role as Director of ADM Australia Holdings I Pty Ltd, a responsible member of its board, being the principal governing body of ADM Australia Holdings I Pty Ltd.



TIMOTHY HENRY

DIRECTOR

ADM Australia Holdings I Pty Ltd

Date: 22 July 2026